July 22, 2003

TO: Internal File

THRU: Daron Haddock, Permit Supervisor

FROM: David Darby, Senior Reclamation Specialist

RE: 2001 1st Quarter Water Monitoring, Consolidation Coal Company, Emery Deep

Mine, C/015/015

1. Was data submitted for all of the MRP required sites?YES [X] NO [] Identify sites not monitored and reason why, if known:

File O:\015015.eme\waterquality\datacheck070303.xlt is the working spreadsheet to track submissions and trends of surface and groundwater data in the DOGM Water Quality Database from years 2000 to 2003, submitted by Consolidation Coal Company.

2. On what date does the MRP require a five-year resampling of baseline water data.

See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.

Resampl	ing due	date d	January	2008	
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3. Were all required parameters reported for each site? YES [] NO [X] Comments, including identity of monitoring site:

Section VI of the MRP contains Tables VI-21 and 22 identify the monitoring sites, monitoring frequency and Parameters that need to be sampled. The operator presents a parameter list in the first column of Table VI-23. It shows springs and wells have the same parameters list. The operator is collecting only flow water level data, thus the parameter list should be changed.

The spreadsheet separates water monitoring sites by type, that is, wells springs, streams and UPDES sites. The Spring monitoring requirements should be separated from the well monitoring requirements in Table VI-22 of the MRP. I discussed this issue with Tim Kirshbaum on July 15, 2003 and Jim Byars on July 16, 2003.

4. Were irregularities found in the da	1 .	Were	irregul	larities	found	in	the	dat	a
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YES [X] NO []

Comments, including identity of monitoring site:

Well monitoring data is adequate for the quarter.

All well data submitted for the quarter is adequate.

Streams

Stream monitoring data for the quarter is in the database. Stream samples did not include oil/grease, levels of total Potassium, Calcium and Sodium which are required in the monitoring program, Table VI-23.

Springs

Data is in the data base for all springs for the 1st quarter**5. Were DMR forms submitted** for all required sites?

1st month, YES [] NO [X] 2nd month, YES [] NO [X] 3rd month, YES [] NO[X]

Identify sites and months not monitored:

6. Were all required DMR parameters reported?

YES [] NO [X]

Comments, including identity of monitoring site:

7. Were irregularities found in the DMR data?

YES[X] NO[]

Comments, including identity of monitoring site:

There were no DMR forms in the Blue Book for the first quarter of 2001.

There is a question about the sedimentation (UPDES) ponds identity that are listed in the database as pond 6. I talked to James Byars on July 16, 2003. When he returns from vacation we will meet to straighten out the numbering convention in the database that causes confusion.

8. Based on your review, what further actions, if any, do you recommend?

I have contacted with James Byars on July 16, 2003 to let him know there are discrepancies in the quarterly data. We plan to meet to reevaluate the monitoring plan. He is currently on vacation. When he returns, I will meet with him and show him the discrepancies in the reported data.

The operator should be ask to supply the UPDES data for the first quarter of 2001.

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